

**From:** [Craig Ziady](#)  
**To:** [Rodriguez, Sebastian](#)  
**Cc:** [bhoskins@fslassociates.com](mailto:bhoskins@fslassociates.com)  
**Subject:** RE: Risk Assessment and PCB sampling comments  
**Date:** Tuesday, August 11, 2020 4:53:51 PM

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Hi Sebastian – Thanks for your note, although we are a bit perplexed by your question. From our perspective, EPA’s comment a year ago was not entirely accurate. Despite EPA’s “interpretation,” our initial risk characterization report (February 2019) did not itself include an elimination of COCs. The conclusions of such report will, however, be used to eliminate COCs (and develop a site conceptual model) in the RCRA Facility Investigation (RFI) report. The Corrective Measures Study will be pertinent to those compounds that represent a significant risk to human health or the environment as established in the RFI. Further, MassDEP does in fact allow for elimination of COCs in Method 3 risk assessments under specific conditions or circumstances, including where factors not related to vapor intrusion (e.g., outdoor air contaminants and contaminants due to indoor building sources) eliminate the contribution to indoor air risk. There was no open action item, however, from our perspective, on this topic last year. We still fully intend to address the issue in the RFI.

As we appear to be making progress with access to Mill Pond in Danvers and look forward to conducting sampling soon, can you please confirm that we may postpone the August progress report until next month, when we hope to have a more substantive update?

Thanks very much.  
Best,  
Craig

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**From:** Rodriguez, Sebastian [mailto:[rodriguez.sebastian@epa.gov](mailto:rodriguez.sebastian@epa.gov)]  
**Sent:** Sunday, August 9, 2020 11:24 PM  
**To:** 'Bruce Hoskins'  
**Cc:** Craig Ziady  
**Subject:** RE: Risk Assessment and PCB sampling comments

Hi Craig and Bruce,

I know that the current focus of the USM project has been the preparation of the Baseline Eco-Risk Assessment; that said, I also wanted to check in and inquire about the status of the *Revised Vapor Intrusion Risk Assessment*. Are there any updates on this revised submittal in between our communication in the below email (EPA providing some comments on the initial submittal) and the present?

Thanks.

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**From:** Rodriguez, Sebastian  
**Sent:** Monday, August 26, 2019 5:32 PM  
**To:** Bruce Hoskins <[BHoskins@FslAssociates.com](mailto:BHoskins@FslAssociates.com)>  
**Cc:** Craig Ziady <[craig@cummings.com](mailto:craig@cummings.com)>  
**Subject:** RE: Risk Assessment and PCB sampling comments

Good afternoon Bruce,

I hope all is well with you and that you enjoyed your time off a couple of weeks ago- it's a beautiful time of year for a break. I was able to access some of Carolyn's old e-mails today between herself and our risk assessor, and I am passing along her final thoughts on the human health risk assessment as she had indicated on a 5/14 e-mail to Craig (with you cc'ed).

The below text recalls some back-and-forth discussion between EPA and Cummings/FSL Associates regarding an EPA comment on the *Initial Site Risk Characterization* report and subsequent revisions. EPA's additional comment follows the discussion.

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### **Section 2.2.2 Development of Exposure Profiles**

*EPA Comment: Please provide more detail on the Conceptual Site Model for human exposures to contaminants. Provide more detail about how subsurface vapors, where they may exist, would enter each suite in relation to the subsurface contamination (soil gas measurements indicate residual soil contamination). Discuss site specific utilities, ventilation, air pressure, etc. Discuss the specifics of the potential exposure pathways. A digital manometer can be used to evaluate if the source of the subsurface soil gas is potentially from indoor air operation at Suite S-140-A. 5*

*How long has the manufacturing facility been operating at Suite S-140-A or any other suite in the building? If it had a previous location, that should also be identified. This is relevant information in the evaluation of some of the claims with respect to indoor air and soil gas collected prior to 2018. Please provide the MSDS sheets obtained for the location. Are there other similar locations that may be impacting any of the suites that were sampled?*

**Response:** *We respectfully disagree with EPA's comment, as it relates to this report, which, as described above, is intended as a baseline to determine the total indoor air risk. Although future reports such as the Phase II will contain a conceptual site model and detailed information on Suite S-140-A, such information is not required to determine the total indoor air risk, and as such, is not contained in this report.*

*EPA Response (January 2019):*

*This is an issue that will need to be addressed in the revised report. The new data from adjacent suites and all the older data need to be incorporated for a complete and accurate conceptual site model and data evaluation.*

**Supplemental Response:** *Please see three immediately preceding supplemental [sic] responses, including the specific purpose of this report (as stated in Section 1): Given such purpose, a site conceptual model is not relevant to this type of report. This report is essentially an exercise in mathematics, while drawing conclusions as to which chemical compounds are significant risk drivers and where such compounds are located. This report does not expressly evaluate whether compounds are present due to vapor intrusion or some other mechanism. **This report seeks to define which compounds need to be evaluated further due to risk concerns.** The revised report has updated the data tables to include the 2012-2015 data and additional data from Suite 135C collected in December 2018.*

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**8/26/2019 EPA COMMENT:** EPA interprets the highlighted text to refer to a process called "elimination of COCs". As MassDEP does not allow for elimination of COCs in a Method 3 risk assessment, all of the contaminants that show an inhalation risk should be included at this stage of the process. A decision concerning the specific chemicals that drive remediation should instead be made in the Corrective Measures Study.

I wish to echo Carolyn's 5/14 comment, that outside of the above, **no further revisions will be needed until the final submittal.** Please let me know if you have any additional questions.

Sebastian Rodriguez

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Please consider the environment before printing.

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**From:** Bruce Hoskins <[BHoskins@FslAssociates.com](mailto:BHoskins@FslAssociates.com)>  
**Sent:** Thursday, August 08, 2019 10:41 AM  
**To:** Rodriguez, Sebastian <[rodriguez.sebastian@epa.gov](mailto:rodriguez.sebastian@epa.gov)>  
**Subject:** FW: Risk Assessment and PCB sampling comments

Sebastian:

I have attached the last version of the initial vapor intrusion risk assessment – Feb 2019. Below is the last email from Carolyn about this report; we never did get any final comments on the risk assessment however.

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**From:** Casey, Carolyn [<mailto:Casey.Carolyn@epa.gov>]  
**Sent:** Tuesday, May 14, 2019 9:06 AM  
**To:** Craig Ziady  
**Cc:** Zucker, Audrey; Wainberg, Daniel; Bruce Hoskins; Steve Drohosky; Rodriguez, Sebastian  
**Subject:** RE: Risk Assessment and PCB sampling comments

That subject should not have included Risk assessment – but, I will be sending some final comments on the draft human health risk assessment later today but no further revisions will be needed until the final submittal.

We plan to have the eco QAPP comments to you on or before the 28<sup>th</sup> of May. Please consider this date for planning purposes when updating the schedule.

I took a quick look at the progress report. It would be more useful and appropriate to include updates on (1) the status of Elliot Landing, (2) status of groundwater sampling wrt to the PCBs detected in groundwater and (3) details on exactly what additional work has been done to the HVAC system, as we previously requested.

Thanks  
Carolyn

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**From:** Casey, Carolyn

**Sent:** Tuesday, May 14, 2019 8:54 AM

**To:** Craig Ziady <[craig@cummings.com](mailto:craig@cummings.com)>

**Cc:** Zucker, Audrey <[Zucker.Audrey@epa.gov](mailto:Zucker.Audrey@epa.gov)>; Wainberg, Daniel <[Wainberg.Daniel@epa.gov](mailto:Wainberg.Daniel@epa.gov)>; Bruce Hoskins <[BHoskins@FslAssociates.com](mailto:BHoskins@FslAssociates.com)>; Steve Drohosky <[sjd@cummings.com](mailto:sjd@cummings.com)>; Rodriguez, Sebastian <[rodriguez.sebastian@epa.gov](mailto:rodriguez.sebastian@epa.gov)>

**Subject:** RE: Risk Assessment and PCB sampling comments

Thank you for the revised figure and table for the PCB sampling in bldg. 100, via email dated May 7, 2019. There are no further comments and the sampling should begin as soon as possible in consideration of providing Sebastian Rodriguez and all, the appropriate notice.

In accordance with Section IX. Paragraph 17.g., could you please update the schedule and submit it within 14 days, or May 28, 2019.

I am again requesting copies of all of the Material Data Safety Sheets for American Schoen. I have only received one for the Tru-Fit Shank Material containing  
Di-2-Propenyl 1,2-Benzenedirboxylate Diallyl Phthalate  
and Dicumyl Peroxide

Finally, Since May 30<sup>th</sup> will be my last day, we would like to schedule a conf call with you all and the EPA's new project manager for introductions and an update. Preferably the 29<sup>th</sup> of May.

Thank you,  
Carolyn

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**From:** Craig Ziady <[craig@cummings.com](mailto:craig@cummings.com)>

**Sent:** Monday, May 13, 2019 5:45 PM

**To:** Casey, Carolyn <[Casey.Carolyn@epa.gov](mailto:Casey.Carolyn@epa.gov)>

**Cc:** Zucker, Audrey <[Zucker.Audrey@epa.gov](mailto:Zucker.Audrey@epa.gov)>; Wainberg, Daniel <[Wainberg.Daniel@epa.gov](mailto:Wainberg.Daniel@epa.gov)>; Bruce Hoskins <[BHoskins@FslAssociates.com](mailto:BHoskins@FslAssociates.com)>; Steve Drohosky <[sjd@cummings.com](mailto:sjd@cummings.com)>; Rodriguez, Sebastian <[rodriguez.sebastian@epa.gov](mailto:rodriguez.sebastian@epa.gov)>

**Subject:** April 2019 Progress Report

Carolyn/Sebastian - Please find enclosed the Progress Report dated May 13, 2019 for the former United Shoe Machinery Division parcel in Beverly.

Please let me know if you have any questions.

Thank you.

Craig

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